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VIA ECF

The Honorable P. Kevin Castel
United States Courthouse
Courtroom 11 D
500 Pearl Street
New York, New York 10007

May 13, 2025

Re: Brian Donnelly AKA KAWS et al. v. Jonathan Anand et al., Civil Action No. 1:21-cv-09562 (PKC) (BCM)

Dear Judge Castel:

This office represents Plaintiffs in the above-captioned action, and we now write to the Court to bring closure to the civil action that we commenced 3.5 years ago.

Pursuant to this Court's Order to Show Cause issued November 8, 2024 (ECF #133) as to why the bankruptcy stay ought not be lifted, Plaintiffs submitted a three-page letter on November 19, 2024 (ECF #136) explaining not only that the stay should be lifted but also requesting the Court reinstate Plaintiffs' Default Judgment Motion that Plaintiffs previously had filed on October 24, 2023 (ECF ##122 - 124) per the Court's Sanctions Order of July 21, 2023 (ECF #118).

While the Court issued a subsequent Memo Endorsement Order on November 21, 2024 (ECF #137), it did not address the substance of our request to reinstate Plaintiffs' Default Judgment Motion (ECF #136) and only directed the attorney for the lone remaining defendant, Jonathan Anand, to file a motion to withdraw by December 16, 2024. No further filings seem to have addressed our request to reinstate Plaintiffs' Default Judgment Motion.

After Plaintiffs filed the Default Judgment Motion on October 24, 2023, Mr. Anand filed a Chapter 7 petition in U.S. Bankruptcy Court for the Eastern District of Virginia, in a transparently obvious maneuver to stay this New York action and temporarily forestall a default Judgment. (ECF #125) Subsequent to the Court's Order of April 3, 2025 that granted Mr. Chaubey's request to withdraw as counsel for Anand (ECF #147), no counsel has entered an appearance for Mr. Anand. We now request that the Court issue an order directing Mr. Anand to file a response to Plaintiffs' Default Judgment Motion by a date certain and that should he fail to

Defendant Jonathon Anand shall respond to the plaintiffs default motion (ECF 122-124) by June 2, 2025. Plaintiff shall serve defendant with this Order and file an affidavit of service within five days. SO ORDERED
[Signature]
5-16-25

respond, the Court will grant Plaintiffs the relief of a default judgment as requested in the motion.

Accordingly, we respectfully request the Court's assistance in advancing this matter toward a final conclusion to serve the interests of justice.

Respectfully submitted,

Aaron Richard Golub

